

MARTHA BOERSCH (CABN 126569)
Attorney for the United States
Acting under Authority Conferred by 28 U.S.C. § 515

MATTHEW M. YELOVICH (NYBN 4897013)
Deputy Chief, Criminal Division

LAURA VARTAIN HORN (CABN 258485)
NICHOLAS WALSH (CABN 314290)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Laura.Vartain@usdoj.gov
Nicholas.Walsh@usdoj.gov

NICHOLAS O. HUNTER (DCBN 1022355)
STEPHEN MARZEN (NYBN 2007094)
Trial Attorneys, National Security Division

950 Pennsylvania Ave., NW
Washington, DC 20530
Tel: (202) 353-3434
Fax: (202) 233-2146
Nicholas.Hunter@usdoj.gov
Stephen.Marzen@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 18-CR-00465 MMC
Plaintiff,)	
v.)	STIPULATION TO EXTEND DEADLINE TO FILE
)	ADMITTED EXHIBITS UNDER CRIMINAL
FUJIAN JINHUA INTEGRATED CIRCUIT)	LOCAL RULE 55-1 AND CIVIL LOCAL RULES
CO., LTD,)	5-1(g) AND 79-4(a)
Defendant.)	AND ORDER

1 Counsel for the United States of America and counsel for the Defendant Fujian Jinhua Integrated
2 Circuit Co., Ltd., stipulate and jointly request that the deadline to file admitted exhibits under Criminal
3 Local Rule 55-1, incorporating the requirements of Civil Local Rules 5-1(g) and 79-4(a), be extended
4 from April 12, 2024, to May 10, 2024.

5 Under Criminal Local Rule 55-1, the procedures in Civil Local Rules 5-1 and 79-4 govern the
6 disposition of admitted exhibits after trial. Civil Local Rule 5-1(g) requires the parties to file admitted
7 exhibits on the docket within ten (10) days of the trial verdict. The parties must file a joint certification
8 of counsel with the admitted exhibits. Because the verdict was returned in this case on February 27,
9 2024, under the Local Rules, the original day for the parties to complete this process was March 8, 2024.

10 On March 5, 2024, the parties submitted a stipulation and proposed order requesting an extension
11 of time to meet this deadline. Dkt. 654. The Court granted the parties' request and issued the proposed
12 order on March 6, 2024, extending the original deadline to comply with the Local Rules to April 12,
13 2024. Dkt. 655.

14 Since that time, both sides have been diligently at work on the enormous project of reviewing the
15 hundreds of admitted exhibits. Nonetheless, neither side has finished the work necessary to comply with
16 the Local Rules. Some of the exhibits contain trade secrets, and some contain personal identifiable
17 information ("PII") or other sensitive information, and some of the exhibits are in Mandarin Chinese
18 requiring the use of translators. As a result, the parties need more time to review and assess the admitted
19 exhibits and then to meet and confer regarding (1) whether particular exhibits can be filed without
20 redaction, (2) whether particular exhibits should be redacted before filing, or (3) whether particular
21 exhibits should be filed under seal. Due to the large number of admitted exhibits, the size and
22 complexity of the exhibits, and the press of other business, the parties need additional time.

23 The requested extension of time will prejudice no party, as the total delay after trial is minimal,
24 will assist the Court and speed resolution of any potential issues raised by the filing of the admitted
25 exhibits at trial, in that more time will allow the parties to make an orderly presentation of the issues
26 raised, and is in the interests of justice, in that an accurate assessment of the admitted exhibits will
27 facilitate the ultimate availability of information about the trial to the public.

1 The parties therefore respectfully request a further extension of time to May 10, 2024, to
2 facilitate their coordination of the filing after joint review of the admitted exhibits.

3 IT IS SO STIPULATED.
4

5 Dated: April 10, 2024

MARTHA BOERSCH
Attorney for the United States

7 /s/ Nicholas Walsh

8 LAURA VARTAIN HORN
9 NICHOLAS WALSH
Assistant United States Attorneys

10 NICHOLAS O. HUNTER
11 STEPHEN MARZEN
Trial Attorneys, National Security Division

12
13 Dated: March 5, 2024

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

14
15 /s/ Emily Reitmeier

16 JACK P. DICANIO
17 MATTHEW E. SLOAN
EMILY REITMEIER
Attorneys for Defendant
Fujian Jinhua Integrated Circuit Co., Ltd.

ORDER

For good cause shown, the Court hereby extends the deadline for the parties to file the admitted trial exhibits, or to take other appropriate action regarding those exhibits, until May 10, 2024.

IT IS SO ORDERED.

DATED: April 11, 2024



THE HONORABLE MAXINE M. CHESNEY UNITED
STATES SENIOR DISTRICT JUDGE

THE HONORABLE BETH LABSON FREEMAN
UNITED STATES DISTRICT JUDGE (GENERAL DUTY)